

# *Exhibit A*

Shirley Gibson

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF MONTANA  
3 BILLINGS DIVISION  
4 TRACY CAEKAERT, and  
5 CAMILLIA MAPLEY,  
6 Plaintiffs, Case No. CV-20-52-BLG-SPW  
7 vs.  
8 WATCHTOWER BIBLE AND TRACT  
9 SOCIETY OF NEW YORK, INC.,  
10 WATCH TOWER BIBLE AND  
11 TRACT SOCIETY OF  
12 PENNSYLVANIA, and BRUCE  
13 MAPLEY SR.,  
14 Defendants.  
15 WATCHTOWER BIBLE AND TRACT  
16 SOCIETY OF NEW YORK, INC.,  
17 Cross Claimant,  
18 BRUCE MAPLEY, SR.,  
19 Cross Defendant.  
20  
21 ARIANE ROWLAND, and JAMIE  
22 SCHULZE Cause No. CV 20-59-BLG-SPW  
23 Plaintiff,  
24 vs.  
25 WATCHTOWER BIBLE AND TRACT

## Shirley Gibson

1 SOCIETY OF NEW YORK, INC.  
2 and WATCH TOWER BIBLE AND  
3 TRACT SOCIETY OF  
4 PENNSYLVANIA,  
5 Defendants.

## Defendants.

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VIDEOCONFERENCE/VIDEOTAPED DEPOSITION

10 UPON ORAL EXAMINATION OF  
11 SHIRLEY GIBSON

23

Shirley Gibson

1 A. He was going to handle it.

2 Q. Okay. So he didn't say he was going to  
3 tell the authorities.

4 A. No, but I thought that's what he would  
5 do.

6 Q. I see. And if he had done -- Let's say  
7 he -- Let's say he told you not to, did you  
8 understand you could go to the authorities if you  
9 wanted to?

10 A. Yeah. He didn't tell me I couldn't, but  
11 I assumed he was going to take care of it.

12 Q. Okay.

13 A. And I should have done it.

14 Q. When did you -- When did you follow up  
15 with him on that?

16 A. I never had any contact with -- I mean, I  
17 never had any more conversations with him or  
18 anybody else about it after that.

19 Q. Okay. Did other people in the  
20 congregation know that Gunner had molested Tracy  
21 and Ronda?

22 A. Yes.

23 Q. How did they find out about it?

24 A. Same way I did, I guess. I never asked  
25 them.

**Shirley Gibson**

1           Q.    Okay. Who -- Can you identify other  
2    people who knew about it by name?

3           A.    Martin Svenson, James Rowland,  
4    Joyce Hains, June Rimby. All deceased now.

5           Q.    Mm-hmm. Anyone else that you know that  
6    knew about it?

7           A.    No.

8           Q.    Were you permitted to tell people about  
9    it?

10          A.    I could have, but I didn't.

11          Q.    Okay. So you understood that you could,  
12    you could have gone to the authorities or you  
13    could have told people about it, but you didn't.

14          A.    Yes.

15          Q.    You chose not to.

16          A.    I chose not to.

17          Q.    Okay.

18          A.    It was a mistake.

19          Q.    Sorry?

20          A.    Was a mistake.

21          Q.    Okay. And had you ever been taught as a  
22    member of the church that the elders direct how to  
23    handle situations like wrongdoing within the  
24    congregation?

25          A.    Yes.

**Shirley Gibson**

1           Q.    And is that because -- Was Tracy there  
2 when Gunner molested Ronda?

3           A.    I'm assuming. I -- I don't know.

4           Q.    Okay. Okay. But so you learned that  
5 from Tracy.

6           A.    Yes.

7           Q.    Okay. So going back here, you're talking  
8 about you're in the home, Bruce sits the family  
9 down, he asks Tracy to tell the family what  
10 happened to her at Gunner's house, is that right,  
11 essentially?

12          A.    Yes. And then he admitted he did it  
13 to -- and he was sorry, he'd never do it again.  
14 Back in those days we didn't know about all  
15 this -- terrible things, so we assumed when  
16 somebody says you're sorry and they're not going  
17 to do it again, they don't, but that was wrong,  
18 too.

19          Q.    And so in 1977 in your home when Bruce  
20 has Tracy tell the family what Gunner had done to  
21 her, in that same conversation, he told your  
22 family, that would be you, Tracy, Camie, and  
23 Bruce, Jr., right?

24          A.    Yes.

25          Q.    That -- That he had been molesting Tracy

Shirley Gibson

1 as well.

2 A. Yes.

3 Q. Was Tracy upset during that? Was she  
4 crying or?

5 A. Course she was.

6 Q. She was?

7 A. Yes.

8 Q. How about Camie?

9 A. Camie never said much.

10 Q. Okay. What did Bruce say he'd been doing  
11 to Tracy?

12 A. You know, he never did say. He just said  
13 he molested her, so I used my imagination.

14 Q. Okay.

15 MR. SWEENEY: Mind if we take a break?

16 MR. SHAFFER: Yeah, that's fine.

17 MR. SWEENEY: Thank you.

18 THE VIDEOGRAPHER: Let's go off the  
19 record. It's 10:23.

20 (Recess taken from 10:23 a.m. to  
21 10:36 a.m.)

22 THE VIDEOGRAPHER: We're back on the  
23 record. It's 10:36.

24 BY MR. SHAFFER:

25 Q. Ms. Mapley, I should have mentioned